

**ATTACHMENT 2**  
**Defs' Resp. and Objs. to Pltfs.' 1st Set of Interrog.**  
**(10-7-11)**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

ROCKWELL AUTOMATION, INC. and  
ROCKWELL AUTOMATION  
TECHNOLOGIES, INC.,  
Plaintiffs,

v.

WAGO CORPORATION AND WAGO  
KONTAKTTECHNIK GMBH & CO. KG,  
Defendant.

Case No.3:10CV718-WMC

**DEFENDANTS' RESPONSES AND OBJECTIONS TO  
PLAINTIFFS' FIRST SET OF COMMON INTERROGATORIES**

To: John M. Hintz, Esq.  
Chadbourne & Parke, LLP  
30 Rockefeller Plaza  
New York, N.Y. 10112

Counsel for Plaintiffs  
ROCKWELL AUTOMATION, INC. and  
ROCKWELL AUTOMATION TECHNOLOGIES, INC.

Pursuant to Federal Rule of Civil Procedure 33, Defendants WAGO Corporation (“WCP”) and WAGO Kontakttechnik GmbH & Co. KG (“WKT”) herein respond and object to Plaintiffs’ First Set of Common Interrogatories dated September 7, 2011 (hereinafter the “**Interrogatories**”). Defendants reserve all objections and do not waive any objection.

**GENERAL OBJECTIONS**

Each of Defendants’ responses is made subject to the following objections, and all other objections stated herein, without waiver of any objection.

1. Objection is made to the extent Plaintiffs’ Interrogatories purport to require the production of material covered by the attorney-client privilege, the work product doctrine, or any

other applicable privilege.

2. Objection is also made to the extent Plaintiffs' Interrogatories purport to require the production of confidential business information subject to protection under Federal Rule of Civil Procedure 26(c)(1)(G), except to the extent such material may be provided pursuant to the protective order currently being negotiated by the parties to govern the production of confidential discovery information in the above-captioned matter, which would enable responsive material to be produced.

3. Objection is finally made to the extent Plaintiffs' Interrogatories are overbroad, unduly burdensome, or purport to require the production of material not reasonably calculated to lead to the discovery of admissible evidence.

#### **RESPONSES TO DEFENDANT'S FIRST SET OF COMMON INTERROGATORIES**

**Plaintiffs' Interrogatory No. 1:** *With respect to each claim of each of the Patents-In-Suit, on a claim-by-claim basis, identify all Prior Art that you contend invalidates each claim.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 1:** To the extent Plaintiffs' Interrogatory No. 1 purports to require a response with regard to claims of the Patents in Suit which as not contended to be infringed in Plaintiffs' Infringement Contentions dated September 16, 2011, Defendants object to Plaintiffs' Interrogatory No. 1 as being overbroad and unduly burdensome and as seeking material that is not likely to lead to the discovery of admissible evidence.

**Defendants' Response to Plaintiffs' Interrogatory No. 1:** Notwithstanding the foregoing objections, and without waiving any objections, Defendant's Contentions of Invalidity and Unenforceability dated September 30, 2011, and the documents incorporated by reference therein (including, but not limited to, the documents attached thereto), are incorporated by

referenced as if fully restated herein and produced herewith; provided, however, the foregoing identification of prior art invalidating the claims of the Patents in Suit is made without waiver of any additional prior art which may be identified hereafter.

**Plaintiffs' Interrogatory No. 2:** *On a patent-by-patent basis, describe in detail the factual circumstances of Defendants' first awareness of each of the Patents-In-Suit, including the date(s) and the person(s) who first became aware of each of the Patents-In-Suit.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 2:** Defendants object to Plaintiffs' Interrogatory No. 2 to the extent it seeks production of material covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

**Defendants' Response to Plaintiffs' Interrogatory No. 2:** Notwithstanding the foregoing objections, and without waiving any objections, Defendants first became aware of the Patents in Suit on November 17, 2010, when service of process in the above-captioned litigation was effected on Gregory Rinn, Vice President of WCP, who shortly thereafter provided a copy of the summons and Complaint (with the Patents in Suit attached) to Jens Adler, General Counsel of WKT.

**Plaintiffs' Interrogatory No. 3:** *List all products by name, model number, version, manufacturer, and release date that contain structures, functionality, or modes of operation described in the Patents-In-Suit that Defendants have imported into the United States or that Defendants have made, used, offered for sale, or sold in the United States.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 3:** Defendants object to Plaintiffs' Interrogatory No. 3 as being vague in that the phrase "that contain structures, functionality, or modes of operation described in the Patents-In-Suit" does not sufficiently identify the products for which information is being sought, especially inasmuch as that phrase is distinguished from the defined term "Accused Instrumentalities" which is used elsewhere in the Interrogatories. To the extent Plaintiffs' Interrogatory No. 3 purports to require a response with

regard to claims of the Patents in Suit which are not contended to be infringed in Plaintiffs' Infringement Contentions dated September 16, 2011, Defendants object to Plaintiffs' Interrogatory No. 3 as being overbroad and unduly burdensome and as seeking material that is not likely to lead to the discovery of admissible evidence.

**Defendants' Response to Plaintiffs' Interrogatory No. 3:** Notwithstanding the foregoing objections, and without waiving any objections, Defendants state that neither Defendant has made, used or sold in, or has imported into, the United States any product meeting all of the requirements — in terms of structures, functionality, or modes of operation — of any of the claims of any of the Patents in Suit. Also without waiving any objections, and interpreting the term “that contain structures, functionality, or modes of operation described in the Patents-In-Suit,” to the extent it purports to describe non-infringing products, as being limited to those products accused of infringement in Plaintiffs' Infringement Contentions dated September 16, 2011, as set forth in WAGO Corporation's Reply Brief on Motion for a More Definite Statement (Dkt. 24-1 at 3), Defendants respond by incorporating the attached schedules (document control numbers WCP 10021-24) by reference as if fully restated herein. Defendants further state that information is provided for the TO-PASS product even though it has not been sold in the United States, because it was identified in Plaintiffs' infringement contentions.

**Plaintiffs' Interrogatory No. 4:** *Identify each person who was responsible for the design and development of each of Defendants' Accused Instrumentalities.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 4:** Defendants object to Plaintiffs' Interrogatory No. 4 as being vague, in that it is unclear what is meant by the term “responsible” in this context. In addition, to the extent Plaintiffs' Interrogatory No. 4 purports to require a response with regard to products which are not accused of infringement in Plaintiffs'

Infringement Contentions dated September 16, 2011, Defendants object to Plaintiffs' Interrogatory No. 4 as being overbroad and unduly burdensome and as seeking material that is not likely to lead to the discovery of admissible evidence. Finally, even to the extent Plaintiffs' Interrogatory No. 4 purports to require a response with regard to products which are accused of infringement in Plaintiffs' Infringement Contentions dated September 16, 2011, Defendants object to Plaintiffs' Interrogatory No. 4 as being not reasonably calculated to lead to the discovery of admissible evidence, inasmuch as the identity of persons "responsible for the design and development of each of Defendants' Accused Instrumentalities" is not relevant to the issues in this case, nor is discovery of persons "responsible for the design and development of each of Defendants' Accused Instrumentalities" likely to lead to evidence relevant to the issues in this case.

**Defendants' Response to Plaintiffs' Interrogatory No. 4:** Notwithstanding the foregoing objections, and without waiving any objections, and interpreting the term "Accused Instrumentalities" as being limited to those products accused of infringement in Plaintiffs' Infringement Contentions dated September 16, 2011, as set forth in WAGO Corporation's Reply Brief on Motion for a More Definite Statement (Dkt. 24-1 at 3), Defendants state that, except as otherwise noted in this paragraph, Dr. Thomas Albers (Head of Development and Product Marketing, Automation Department, WAGO Kontakttechnik GmbH & Co. KG, Hansastrasse 27, 32423 Minden, Federal Republic of Germany, +49 571 887 0), had responsibility for the design and development of WAGO automation products. The TO-PASS product line was acquired by WKT after being developed by Endler & Kumpf GmbH & Co. KG (Schwarzer Weg 10, 32423 Minden, Federal Republic of Germany, +49 571 934 17 10). CoDeSys software, upon which WAGO-I/O-PRO CAA software is based, was developed by 3S-Smart Software Solutions

GmbH (Memminger Strasse 151, 87439 Kempten, Federal Republic of Germany, +49 831 54031-0). The WAGO IPC series was developed as an OEM product by Kontron Modular Computers (U.S. office: 14118 Stowe Dr., Poway, California 92064-7147, (888) 294-4558).

**Plaintiffs' Interrogatory No. 5:** *Describe the level of ordinary skill in the art that Defendants contend is applicable for the purposes of claim construction or for any other purpose in this action, including but not limited to analyses under 35 U.S.C. § 103 and/or 35 U.S.C. § 112.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 5:** Defendants object to Plaintiffs' Document Request No. 5 to the extent it seeks production of material covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

**Defendants' Response to Plaintiffs' Interrogatory No. 5:** Notwithstanding the foregoing objections, and without waiving any objections, Defendants respond that they are still in the process of determining the level of ordinary skill in the art applicable for the purposes of claim construction or for any other purpose in this action, including but not limited to analyses under 35 U.S.C. § 103 and/or 35 U.S.C. § 112; as a result, Defendants do not at present have any contentions to report in response to Plaintiffs' Interrogatory No. 5. Nevertheless, Defendants state that the level of ordinary skill in the art applicable for the purposes of claim construction or for any other purpose in this action, including but not limited to analyses under 35 U.S.C. § 103 and/or 35 U.S.C. § 112, would have to include the level of skill possessed by persons who work with industrial control devices on a regular basis.

**Plaintiffs' Interrogatory No. 6:** *Identify each individual, other than outside counsel, who provided information for use in preparing Defendants' responses to these interrogatories or who participated in preparing Defendants' responses to these interrogatories.*

**Defendants' Objections to Plaintiffs' Interrogatory No. 6:** To the extent Plaintiffs' Interrogatory No. 6 purports to require the production of trial preparation material or other

material covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege, Defendants object on the grounds of such privileges.

**Defendants' Response to Plaintiffs' Interrogatory No. 6:** Notwithstanding the foregoing objections, and without waiving any objections, Defendants state the following: Information was provided on behalf of WCP by Mr. Tom Artmann (President, WAGO Corporation, N120 W19129 Freistadt Road, Germantown, Wisconsin 53022, (800) 346-7245). Information was provided on behalf of WKT by Dr. Thomas Albers (Head of Development and Product Marketing, Automation Department, WAGO Kontakttechnik GmbH & Co. KG, Hansastrasse 27, 32423 Minden, Federal Republic of Germany, +49 571 887 0) and Dr. Norbert Hatke (Patent Engineer, Rechts- und Patentabteilung, WAGO Kontakttechnik GmbH & Co. KG, WAGO Kontakttechnik GmbH & Co. KG, Hansastrasse 27, 32423 Minden, Federal Republic of Germany, +49 571 887 0).

Date: October 7, 2011

Respectfully submitted,

/s/ Robert N. Cook

---

Robert N. Cook  
Whitham, Curtis, Christofferson & Cook, P.C.  
11491 Sunset Hills Road, Suite 340  
Reston, Virginia 20190  
(703) 787-9400 (voice)  
(703) 787-7557 (fax)  
bob@wcc-ip.com

John C. Scheller  
Michael Best & Friedrich LLP  
One South Pinckney Street, Suite 700  
Madison, Wisconsin 53703  
(608) 283-2276 (voice)  
(608) 283-2275 (fax)  
jcscheller@michaelbest.com

Counsel for Defendants  
WAGO CORPORATION and  
WAGO KONTAKTTECHNIK GMBH & CO. KG



**CERTIFICATION**

I certify that on October 7, 2011, I caused the foregoing DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF COMMON INTERROGATORIES to be delivered by email to:

John M. Hintz, Esq.  
Chadbourne & Parke, LLP  
30 Rockefeller Plaza  
New York, N.Y. 10112  
jhintz@chadbourne.com

/s/ Robert N. Cook

---

Robert N. Cook  
Whitham, Curtis, Christofferson & Cook, P.C.  
11491 Sunset Hills Road, Suite 340  
Reston, Virginia 20190  
(703) 787-9400 (voice)  
(703) 787-7557 (fax)  
bob@wcc-ip.com

Item / Model No.	Description	1st Release		Last Release	
		Version ID	Date	Version ID	Date
0750-0804	INTERBUS Controller	0201	1/7/2000	080503	1/16/2009 WAGO
0750-0806	DeviceNet Controller	010101	10/15/2001	090502	1/5/2009 WAGO
0750-0812	Prog. Modbus/RS 485/150-19200 Bd	3001	3/3/1999	3H10	8/22/2008 WAGO
0750-0814	Prog. Modbus/RS 232/150-19200 Bd	3001	3/3/1999	3G14	10/27/2008 WAGO
0750-0815	Prog. Modbus/RS 485/1,2-115,2 kBd	3001	3/3/1999	3G11	9/26/2008 WAGO
0750-0816	Prog. Modbus/RS 232/1,2-115,2 kBd	3001	3/3/1999	3G13	1/18/2010 WAGO
0750-0819	LonWorks Controller	0101	2/15/2001	091103	8/14/2008 WAGO
0750-0830	BACnet/IP Controller	0102	11/29/2007	030502	11/22/2010 WAGO
0750-0833	PROFIBUS Controller	01	9/21/2000	111603	3/31/2010 WAGO
0750-0837	PROFIBUS Controller	0503	9/25/2002	112003	1/6/2011 WAGO
0750-0837	CANopen Controller	0102	12/21/2000	141004	1/13/2011 WAGO
0750-0837/0020-0000	CANopen CONTR.256/192KB PGM/RAM	110604	3/31/2005	141004	1/13/2011 WAGO
0750-0837/0021-0000	CANopen CONTR.640/832KB PGM/RAM	110604	3/31/2005	141004	3/1/2011 WAGO
0750-0838	CANopen CONTROLLER DSUB	110104	3/30/2005	140504	1/5/2011 WAGO
0750-0838/0020-0000	CANopen CONTR.256/192KB PGM/RAM DSUB	110104	5/17/2005	140504	1/20/2011 WAGO
0750-0838/0021-0000	CANopen CONTR.640/832KB PGM/RAM DSUB	110104	5/17/2005	140504	2/14/2011 WAGO
0750-0840	PROFINET CONTROLLER 100 Mbit	n.a.			
0750-0841	Ethernet Controller 10/100 Mbit/s	010101	8/7/2003	191102	3/14/2011 WAGO
0750-0842	Ethernet Controller	0102	11/27/2000	181306	2/7/2011 WAGO
0750-0842/0000-0001	CONTR.ETHERNET 4CONTROL	010306	2/7/2002	021306	4/5/2011 WAGO
0750-0842/0000-0004	Ethernet Controller	330806	8/4/2003		WAGO
0750-0842/0000-0101	Ethernet Controller C-Timeout	171006	4/14/2008	171306	9/22/2010 WAGO
0750-0843	Ethernet Controller	011106	3/31/2009	021306	1/6/2011 WAGO
0750-0849	KNXnet/IP Controller	010101	2/6/2008	040502	10/5/2010 WAGO
0750-0860	Linux Controller	010702	6/12/2006	031102	2/3/2011 WAGO
0750-0865	Straton Controller	030902	10/22/2008		WAGO
0750-0871	Ethernet Controller mit 2-Port Switch	020202	5/13/2008	070502	3/22/2011 WAGO
0750-0872	IEC60870-5 Fernwirkcontroller	010102	7/24/2008	030402	4/27/2011 WAGO
0750-0872/0020-0000	CONTR.ETHERNET TELECONTROL	010702	8/14/2007	020902	5/4/2011 WAGO
0750-0873	Ethernet Controller mit RS232	010102	8/6/2008	030402	5/12/2011 WAGO
0750-0880	Ethernet Feldbuscontroller	020403	3/31/2011		WAGO
0750-0881	Ethernet Feldbuscontroller	010203	8/3/2010	030603	8/3/2011 WAGO
0750-0882	Ethernet MR Controller	010203	2/28/2011	010303	6/29/2011 WAGO

Item / Model No.	Description	1st Release		Last Release		Manufacturer
		Version ID	Date	Version ID	Date	
0758-0870	WAGO I/O IPC	IX 0302	12/22/2004	IX 4011	10/11/2010	Kontron / WAGO
0758-0870/0000-0001	WAGO I/O IPC PROFIBUS	IX 0303	12/22/2004	IX 3711	10/11/2010	Kontron / WAGO
0758-0870/0000-0002	WAGO I/O IPC CANOPEN	IX 3506	3/16/2006	IX 3711 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0004	WAGO I/O IPC, Profibus Slave, 32MB, CoDeSys	IX 3506	3/16/2006	IX 4011 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0001	WAGO I/O IPC CoDeSys 128MB	IX 3506	6/1/2006	IX 4011 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0011	WAGO I/O IPC, 128MB, Profibus Master, CoDeSys	IX 3507	3/15/2006	IX 4011 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0012	WAGO I/O IPC CoDeSys 128MB CAN	IX 3507	3/29/2006	IX 4011 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0014	WAGO I/O IPC, Webvisu. m. Profibus Slave	IX 3507	3/15/2006	IX 4011 nach FW-Update	10/11/2010	Kontron / WAGO
0758-0870/0000-0010	I/O-IPC-G2 Lnx CoDeSys+V	HW 10 Rev:00; FW 01 (V01.00.01)	4/7/2009	HW 10 Rev:xx FW 06	5/13/2011	Kontron / WAGO
0758-0870/0000-0111	I/O-IPC-G2 Lnx CoDeSys+V PDP-M	HW 10 Rev:00; FW 01 (V01.00.01)	4/24/2009	HW 10 Rev:xx FW 06	5/13/2011	Kontron / WAGO
0758-0870/0000-0112	I/O-IPC-G2 Lnx CoDeSys+V CAN-M	HW 10 Rev:00; FW 01 (V01.00.01)	6/4/2009	HW 10 Rev:xx FW 06	7/20/2011	Kontron / WAGO
0758-0870/0000-0130	I/O-IPC-G2 Lnx TeleControl	HW 10 Rev:xx FW 02	1/13/2010	HW 10 Rev:xx FW 05	2/23/2011	Kontron / WAGO
0758-0871/0000-0010	WAGO I/O IPC CE 128MB	IX 3604	6/2/2006	Rev: 14 und Rev: 14 (IX37)	3/10/2011	Kontron / WAGO
0758-0871/0000-0011/0000-0001	WAGO I/O IPC CE 128MB M.PB-Master	IX 3604	6/2/2006	Rev: 14 und Rev: 14 (IX37)	3/3/2011	Kontron / WAGO
0758-0873	WAGO I/O IPC OHNE SYSTEM OHNE FELDB.	IX 0302	12/22/2004	Rev: 14 und Rev: 14 (IX37)	5/10/2011	Kontron / WAGO
0758-0873/0000-0001	WAGO I/O IPC kein OS Profibus Master	IX 0303	12/22/2004	Rev: 13 und Rev: 13 (IX37)	1/21/2009	Kontron / WAGO
0758-0873/0000-0010	WAGO I/O IPC kein OS 128MB	IX 0303	12/22/2004	Rev: 14 und Rev: 14 (IX37)	10/19/2010	Kontron / WAGO
0758-0873/0000-0011/0000-0001	WAGO I/O IPC OHNE SYSTEM M.PB-MASTER	IX 3507	5/3/2006	Rev: 14 und Rev: 14 (IX37)	1/26/2011	Kontron / WAGO
0758-0873/0000-0012/0000-0001	WAGO I/O-IPC no OS, 128MB, COM	IX 3507	5/2/2006	Rev: 14 und Rev: 14 (IX37)	1/26/2011	Kontron / WAGO
0758-0873/0000-0110/0000-0001	WAGO I/O-IPC no OS, 128MB, CoDe	IX 3606	9/19/2006	Rev: 13 und Rev: 13 (IX37)	1/21/2009	Kontron / WAGO
0758-0873/0000-0111	WAGO I/O-IPC no OS, 128MB, DPM, CoDeSys	IX 3504	10/27/2005	Rev: 14 und Rev: 14 (IX37)	5/4/2010	Kontron / WAGO
0758-0873/0000-0112/0000-0001	WAGO I/O-IPC no OS, 128MB, COM, CoDeSys	IX 3711	5/18/2007	Rev: 13 und Rev: 13 (IX37)	1/21/2009	Kontron / WAGO
0758-0874/0000-0110	I/O-IPC-C6 Lnx CoDeSys+V	HW10 Rev:xx FW01	4/20/2009	HW10 Rev:xx FW06	5/10/2011	Kontron / WAGO
0758-0874/0000-0112	I/O-IPC-C6 Lnx CoDeSys+V CAN-M	HW10 Rev: xx FW01	4/20/2009	HW10 Rev:xx FW06	6/29/2011	Kontron / WAGO
0758-0875/0000-0110	I/O-IPC-C10E Lnx CoDeSys+V	HW10 Rev:xx FW01	4/16/2009	HW10 Rev:xx FW06	5/13/2011	Kontron / WAGO
0758-0875/0000-0111	I/O-IPC-C10E Lnx CoDeSys+V PDP-M	HW10 Rev:xx FW01	4/16/2009	HW10 Rev:xx FW05	12/15/2010	Kontron / WAGO
0758-0875/0000-0112	I/O-IPC-C10E Lnx CoDeSys+V CAN-M	HW10 Rev: xx FW01	4/7/2009	HW10 Rev:xx FW05	12/15/2010	Kontron / WAGO
0758-0875/0000-0130	I/O-IPC-C10 E Lnx TeleControl	HW10 Rev:xx FW01	10/29/2010	HW10 Rev:xx FW06	6/29/2011	Kontron / WAGO
0758-0876/0000-0110	I/O-IPC-P14 Lnx CoDeSys+V	HW10 Rev:xx FW01	4/20/2009	HW10 Rev:xx FW06	7/11/2011	Kontron / WAGO
0758-0876/0000-0111	I/O-IPC-P14 Lnx CoDeSys+V PDP-M	HW10 Rev:xx FW01	4/20/2009	HW10 Rev:xx FW06	5/13/2011	Kontron / WAGO
0758-0876/0000-0112	I/O-IPC-P14 Lnx CoDeSys+V CAN-M	HW10 Rev: xx FW01	4/20/2009	HW10 Rev:xx FW06	7/11/2011	Kontron / WAGO

Item / Model No.	Description	1st Release		Last Release		Manufacturer
		Version ID	Date	Version ID	Date	
0761-0100	TO-PASS S	0202	21.01.2008	0404	11.01.2011	WAGO
0761-0101	TO-PASS S 2AI	0202	19.12.2007	0404	06.09.2010	WAGO
0761-0102	TO-PASS S WEB	0202	21.01.2008	0404	11.01.2011	WAGO
0761-0103	TO-PASS S 2AI WEB	0202	21.01.2008	0404	31.01.2011	WAGO
0761-0110	TO-PASS Compact	0101	21.06.2010	0303	18.04.2011	WAGO
0761-0111	TO-PASS Compact 2AI	0101	24.06.2010	0303	18.04.2011	WAGO
0761-0112	TO-PASS Compact, Web	0101	24.06.2010	0303	18.04.2011	WAGO
0761-0113	TO-PASS Compact, 2AI, Web	0101	21.06.2010	0303	18.04.2011	WAGO
0761-0200	TO-PASS M	0202	21.01.2008	0404	11.01.2011	WAGO
0761-0201	TO-PASS M 8AI	0202	21.01.2008	0404	11.01.2011	WAGO
0761-0202	TO-PASS M 8AI ESP	0202	21.01.2008	0404	20.04.2010	WAGO
0761-0203	TO-PASS M 8AI DSP	0202	21.01.2008	0404	20.04.2010	WAGO
0761-0204	TO-PASS M 8AI ESP DSP	0202	21.01.2008	0404	27.01.2011	WAGO
0761-0205	TO-PASS M WEB Modbus	0202	21.01.2008	0404	22.02.2011	WAGO
0761-0206	TO-PASS M 8AI WEB Modbus	0202	21.01.2008	0404	22.02.2011	WAGO
0761-0210	TO-PASS Compact	0101	24.06.2010	0303	18.04.2011	WAGO
0761-0214	TO-PASS Compact, 8AI, ESP, DSP	0101	24.06.2010	0303	18.04.2011	WAGO
0761-0216	TO-PASS Compact, 8AI, Web, MODBUS	0101	23.06.2010	0303	18.04.2011	WAGO
0761-0314	TO-PASS Mobile	0101	14.07.2011	0303	18.04.2011	WAGO
0761-0316	TO-PASS Mobile Web, Modbus	0101	14.07.2011		WAGO	
0761-0510	TO-PASS Modem GPRS RS232	0101	18.02.2009		WAGO	
0761-0520	TO-PASS Modem GPRS VPN Router	0101	18.02.2009		WAGO	

Rockwell v. WAGO  
**WCP 10023**  
 3:10CV718-WMC (W.D. Wis.)

Item / Model No.	Description	1st Release		Last Release		
		Version ID	Date	Version ID	Date	Manufacturer
0759-0911	WAGO-I/O-PRO CAA CD	02.03.03.06	3/7/2005	02.03.09.28	7/21/2011	3S / WAGO
0759-0332	WAGO-I/O-PRO 32	1001	11/28/2000	1602	5/8/2003	3S / WAGO
0759-0333	WAGO-I/O-PRO			2.2.6.0	3/6/2003	3S / WAGO
0795-0907	WAGO-I/O-PRO	1.5.5	21.12.1999			
0759-0930	TO-PASS S/M Software	02	12/12/2007	04	9/23/2011	WAGO (take over from Endler & Kumpf)
0759-0340	TOPLON	n.a (Release mit 750-819)	approx. 2001			WAGO
	Linux (PLC)	2.4.xx-XXx	approx. 2006	2.6.34-UC0	10/5/2011	Open Source
	Linux(IPC)			2.6.29.6-RT24	1/25/2011	Open Source